

EX PARTE OR LATE FILED

STEPTOE & JOHNSON LLP

1330 Connecticut Avenue, NW
Washington, DC 20036-1795

Telephone 202.429.3000
Facsimile 202.429.3902
www.steptoel.com

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Thomas M. Barba
202.429.8127
tbarba@steptoel.com

July 9, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

EX PARTE NOTICE

**Re: In the Matter of Communications Assistance for Law
Enforcement Act, CC Docket No. 97-213**

Dear Ms. Salas:

On July 9, 1999, representatives of the Telecommunications Industry Association ("TIA") and its member companies met with staff members of the Federal Communications Commission regarding this proceeding. The meeting was attended by the following Commission personnel: Julius Knapp, Geri Matise, and Charles Iseman (of the Office of Engineering and Technology), and Jim Green and Charlene Lagerwerff (of the Wireless Telecommunications Bureau).

Pursuant to 47 C.F.R. § 1.1206, an original and two copies of this letter and TIA's presentation material are enclosed for filing. A copy of the attendance list from the meeting is also enclosed. We are providing copies of this submission to the Commission staff present at the meeting. Please do not hesitate to contact me if you have any questions.

Sincerely,



Thomas M. Barba

encl.

cc (w/encl.): Julius Knapp, Geri Matise, Charles Iseman, Jim Green and Charlene Lagerwerff

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Federal Communications Commission
Office of Secretary

mtg. w/ TIA, July 9, 1999

Seraldine Matise	FCC-OET	432-2322
James Green	FCC-WTB	418-0631
Charlene Jagerwaff	FCC-WTB	418-1349
Ben Ederington	Stepoe (not TIA)	429-6411
Charles Jernin	FCC-OET	418-2444
Derek Khlopun	TIA	383-1486
Stewart Baker	Stepoe, TIA	429-6413
Grant Sciffert	TIA	383-1483
many, brooner	motorola	371-6899
Thomas M. BARBA	Stepoe & Johnson	429-8127
RAY STRASSBURGER	Nonex	508-9605
Sue McNeil	Luxent	530-7019

Standardization by TR 45.2

- TIA strongly endorses the Commission's decision to remand to TR 45.2.
- TIA will make every effort (consistent with its responsibilities as an ANSI-accredited standards-setting body) to expedite the completion of a revised standard.
- However, as TIA explained in its previous filings,¹ TR 45.2 cannot complete, ballot and publish a revised standard within 180 days.
- As an ANSI-accredited organization, TR 45.2 must put the revised standard out for ballot (a minimum of 60 days) and must reconcile any comments (at least another 30 days) before submitting to ANSI for adoption. TIA has no control over these requirements.
- As TIA explained in its comments, given this lengthy ballot/review process, one year is more realistic. It might be possible for TR 45.2 to complete the drafting work within 180 days, with another 4 to 5 months for V&V, ballot, review and approval:
 - Develop Stage 1 text: 2 months
 - Develop call flows and Stage 2 text: 2 months
 - Develop Stage 3 text: 2 months
 - Verification and validation of document (prior to ballot): 1 month
 - Ballot: 2 months
 - Ballot review: 1 to 2 months
- This workplan is based on an ambitious schedule of meeting every 3 weeks, for the duration of a week. The members of the ad hoc group serve on a number of other critical standards efforts (like E-911, number portability, disabilities, etc.).
- TR 45.2 has already taken several actions to prepare for this work -- obtaining project numbers and reestablishing the Ad-Hoc LAES group, chaired by Nokia and BANM.
- The ad hoc working group plans to wait 30-days before initiating work, to make sure that there aren't any petitions for reconsideration. Is this acceptable to the Commission? Could the Commission say so in the Order?

¹ Comments on the FNPRM, at 7-17 (filed on Dec. 14, 1998); Reply Comments on FNPRM, at 8-11 (filed on Jan. 27, 1998).

Packet Data

- The network is increasingly transitioning to a packetized architecture. Thus, TIA appreciates the Commission's caution in avoiding hasty actions that might stifle the development of particular technologies.
- Most manufacturers are not developing CALEA solutions for packet-mode communications, but have been awaiting the Commission's decision.
- This decision to postpone development efforts is consistent with the Commission's previous guidance that manufacturers only should develop the "core" J-STD-025 (excluding packet data) by June 30, 2000.²
- Manufacturers should be given at least the same deadline for developing solutions for packet-mode communications as the Commission provides for any punch list items.

Compliance Deadline

- TIA supports the Commission's decision, consistent with section 107(b)(5) of CALEA, to establish a subsequent deadline for compliance with its decision.
- However, June 30, 2001 is an unrealistically short period of time for carriers to install the equipment necessary to comply with the Commission's order.
- As TIA has explained in numerous filings, manufacturers require at least 24 months to develop new products. Carriers then require additional time to install this equipment.
- The punch list items that the Commission is considering adopting would require fairly extensive development efforts. These are not simple software solutions that a carrier can buy off of the shelf and simply load onto its switches.

² Extension Order, ¶ 46 & n. 139 (rel. on Sept. 11, 1998); Further Notice, ¶ 46 (rel. on Nov. 5, 1998)